

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

MAX MINDS, LLC,

Plaintiff,

v.

TRIANGLE EXPERIENCE GROUP, INC.,  
ROBERT CLARE, JEFFREY MASE,  
KEVIN MULLICAN, and JOHN DOES 1-10,

Defendants.

CAUSE NO. 1:24-CV-00779-MPB-MKK

JURY TRIAL DEMANDED

**PLAINTIFF’S AMENDED MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff seeks entry of a preliminary injunction and seizure order pursuant to Fed. R. Civ. P. 65, the All Writs Act, 28 U.S.C. § 1651(a), 17 U.S.C. § 502, and the Economic Espionage Act of 1996 as amended by the Defend Trade Secrets Act of 2016, 18 U.S.C. § 1836(b)(2) and (3).

Plaintiff seeks to preliminarily enjoin defendants:

- (1) from copying and distributing plaintiff’s copyrighted and trade secret protected software and source code;
- (2) from creating derivative works of plaintiff’s copyrighted and trade secret protected software and source code;
- (3) from licensing, installing, supporting and servicing plaintiff’s copyrighted and trade secret protected software and source code on computers owned and operated by third-parties including the United States Government;
- (4) from participating in trials, demonstrations, and exercises utilizing plaintiff’s copyrighted and trade secret protected software and source code;

- (5) from entering into agreements with third-party resellers and distributors to copy, distribute, license, install, and support others using plaintiff's copyrighted and trade secret protected software and source code;
- (6) from circumventing the technological measures that effectively control access to plaintiff's copyright and trade secret protected software;
- (7) from removing plaintiff's copyright management information contained in plaintiff's copyright and trade secret protected software and source code including the plaintiff's name for the software "HAPTIC";
- (8) from falsely designating the source of plaintiff's copyright and trade secret protected software;
- (9) from attaching false or misleading copyright management information to plaintiff's copyright and trade secret protected software and source code without plaintiff's permission; and
- (10) from exposing plaintiff's confidential and trade secret protected source code on the internet and elsewhere online.

The evidence supporting the plaintiff's motion are filed and identified in the accompanying memorandum of law.

DATED: November 25, 2024

Respectfully submitted,

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